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11 Millennium, LLC), Solar Trust of America, LLC, Solar Millennium,
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12 Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar
Power Project Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC
13 and Blythe Solar Power Project Unit 4 LLC*

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 MMR GROUP, INC.,
MMR POWER SOLUTIONS, LLC and
19 SOUTHWESTERN POWER GROUP II, LLC,

20 Plaintiffs,

21 vs.

22 STA DEVELOPMENT, LLC (F/K/A SOLAR
23 MILLENNIUM, LLC), SOLAR TRUST OF
AMERICA, LLC, SOLAR MILLENNIUM AG,
24 SOLAR MILLENNIUM, INC., CA I-10
SOLAR, LLC, PALO VERDE SOLAR I, LLC,
25 PALO VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
26 BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
27 UNIT 3, LLC AND BLYTHE SOLAR POWER
28 PROJECT UNIT 4, LLC

Defendants.

Case No. 3:11-cv-01521-EMC

**STIPULATION TO EXTEND
DEFENDANTS' TIME TO RESPOND
TO AMENDED COMPLAINT AND
[PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER PROJECT UNIT 4 LLC (collectively, the “STAD Defendants”) respectfully request that the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by one week from November 7, 2011 to November 14, 2011.

The reason for the parties’ joint request is that the parties are in advanced stages of settlement discussions and are hoping to reach a settlement forthwith. The parties have requested, and this Court has granted, two continuances of a hearing on an earlier motion to dismiss filed by one of the STAD Defendants. The filing of the Amended Complaint mooted that motion to dismiss. The parties have not requested any extensions of time since the Amended Complaint was filed. Because the parties are only asking for a one-week extension, the parties’ request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants’ time to respond to the Amended Complaint by one week from November 7, 2011 to November 14, 2011.

1 Dated: November 4, 2011

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/ Aaron Renenger

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18 *Solar Millennium, Inc., CA 1-10 Solar, LLC, Palo Verde*
19 *Solar I, LLC, Palo Verde Solar II, LLC, Blythe Solar*
20 *Power Project Unit 1, LLC, Blythe Solar Power Project*
21 *Unit 2, LLC, Blythe Solar Power Project Unit 3, LLC and*
22 *Blythe Solar Power Project Unit 4 LLC*

23 Dated: November 4, 2011

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Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: _____

UNITED STATES DISTRICT COURT JUDGE